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May 26, 2005

**HAND DELIVERED**

Clerk's Office  
United States District Court For  
The District of Massachusetts  
One Courthouse Way  
Boston, MA 02210

RE: IBEX, LLC v. Fairhaven Shipyard, Inc., et. al.  
The United States District Court For The District of  
Massachusetts, Civil Action No. 04-11314-PBS

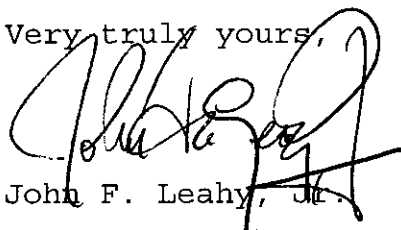
Dear Sir/Madam:

Enclosed please find the following documentation for filing  
in regard to the above-entitled action:

1. DEFENDANT, FAIRHAVEN SHIPYARD, INC.'S, DESIGNATION OF  
EXPERT WITNESS

Thank you for your attention to this matter.

Very truly yours,



John F. Leahy, Jr.

JFL/ag  
Encls.

Cc: William Hewig, III, Esq.  
James J. Duane, III, Esq.  
Robert M. Elmer, Esq.

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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ST. PAUL TRAVELERS, as successor  
in interest to ATLANTIC MUTUAL  
INSURANCE CO. Marine Division,  
subrogee of IBEX LLC, and IBEX, LLC,  
Plaintiffs,

Civil Action No.  
04-11314-PBS

v.

FAIRHAVEN SHIPYARD, INC., and  
A.I. MARINE ADJUSTERS, INC.,  
a member of AMERICAN INTERNATIONAL  
GROUP, INC.,  
Defendants.

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**DEFENDANT, FAIRHAVEN SHIPYARD, INC.'S, DESIGNATION  
OF EXPERT WITNESS**

Now comes the defendant, Fairhaven Shipyard, Inc.,  
pursuant to the court's order dated November 3, 2004, and  
hereby designates its expert witness as follows:

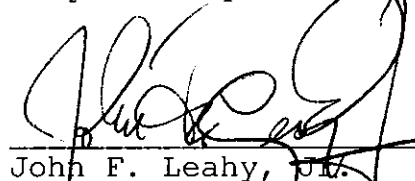
1. Joseph Lombardi  
Marine Surveyor & Consultant Ocean Technical Services  
P.O. Box 1576  
10 Washington Street  
Manchester, MA 01944  
Office: (978) 526-1894

Mr. Lombardi is expected to testify concerning the  
cause, necessity and reasonableness of repairs to the  
vessel IBEX at Fairhaven Marine in 2001 and subsequent  
repairs to the IBEX at Cove Haven Marine in 2002-2003.

The defendant reserves the right to supplement or amend its expert designation.

I hereby certify that a true copy of the above document was served upon each attorney of record by mail on May 26, 2005.

Respectfully submitted,

  
\_\_\_\_\_  
John F. Leahy, Jr.  
Attorney for the Defendant,  
FAIRHAVEN SHIPYARD, INC.  
Long & Houlden  
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BBO# 289860

DATE: 5-26-05